

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

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**VIKRAM P. GROVER d/b/a
“IX ADVISORS” a/k/a “IXA,”**

Plaintiff,

v.

**NET SAVINGS LINK, INC., a
Colorado corporation and formerly
organized as a Nevada corporation,
WILTON GROUP, LIMITED, as
registered in the Isle of Man, U.K.,
WILTON UK (GROUP), LIMITED, as
registered in England and Wales, U.K.,
CHINA FOOD AND BEVERAGE CO.,
a Colorado corporation, and
JAMES A. TILTON,**

Defendants.

**Civil Action No. 1:21-cv-05054
Honorable Mary M. Rowland**

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**PLAINTIFF’S REQUEST FOR ENTRY OF DEFAULT PURSUANT TO
RULE 55(a) AGAINST DEFENDANT WILTON UK (GROUP), LIMITED**

To: Thomas G. Bruton, Clerk of Court
United States District Court for the Northern District of Illinois

The Plaintiff, Vikram P. Grover (hereinafter “Grover” or “Mr. Grover”), pursuant to Rule 55(a) of the Federal Rules of Civil Procedure and the Local Rules of the U.S. District Court for the Northern District of Illinois, respectfully requests entry of a default against the Defendant, Wilton UK (Group), Limited, as registered in England and Wales, U.K., (hereinafter the “Defendant” or “Wilton-UK”), for failure to plead or otherwise defend, in a timely manner, the above-captioned action.

In support hereof, the Plaintiff respectfully submits the Affidavit of Philip M. Giordano, (the “Giordano Affidavit”), together with **Exhibit A**, which is attached, restated and incorporated by reference thereto in support his Request for Entry of Default, as follows:

The Defendant, Wilton-UK, is an entity, duly organized in accordance with the laws of the United Kingdom of Great Britain and Northern Ireland (hereinafter the “U.K.”), is registered in England and Wales, in the U.K., with a registered number 04179664 and with a registered office at 26 Grosvenor Street, Mayfair, London W1K 4QW, U.K. The Plaintiff states Defendant was served on December 1, 2021. *See* Proof of Service, attached, restated and incorporated by reference to the Giordano Affidavit as **Exhibit A**.

The Plaintiff respectfully submits that the Defendant Wilton-UK is not, or has not been, an incompetent person, nor an infant, nor a person in the military service, as defined in the “Service Members Civil Relief Act,” as set forth in 50 U.S.C. §§ 501, *et seq.*

As of the date hereof, the Defendant, Wilton-UK, has failed to file its Answer, responsive papers or otherwise defend the instant litigation in a timely manner, and the time has expired for the same.

WHEREFORE, pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, the Plaintiff, Vikram P. Grover, respectfully requests the entry of a default against the Defendant, Wilton-UK.

Dated: December 23, 2021

Respectfully submitted,
PLAINTIFF, Vikram P. Grover,

By his Attorneys,

/s/ Philip M. Giordano.
Philip M. Giordano, Esq. (admitted *pro hac vice*)
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CERTIFICATE OF SERVICE

I, Philip M. Giordano, do hereby certify that on this 23rd day of December, 2021, I caused to be served a true and correct copy of Plaintiff Vikram P. Grover's Request for Entry of Default for Wilton-UK as filed by and through the District Court's electronic filing/ECF system and that such true copy is available for downloading and viewing by all parties or counsel of record

Dated: December 23, 2021

/s/ Philip M. Giordano
Philip M. Giordano